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1801 Pennsylvania Avenue, NW
Washington, DC 20006

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March 24, 2000

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Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RECEIVED

MAR 24 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

CC Docket No. 98-170

Dear Ms. Salas:

On March 23, 2000, Meg Milroy (via telephone) and I of MCI WorldCom met with Kyle Dixon, legal advisor to Commissioner Powell, to discuss clarification of the truth-in-billing rules. We discussed the issues described in the attached document, which was distributed at the meeting.

In accordance with section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), an original and three copies are being filed with your office.

Sincerely,



Lori Wright
Senior Manager, Regulatory Affairs

cc: Kyle Dixon

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Truth in Billing Reconsideration

CC Docket No. 98-170

MCI WorldCom, Inc.

March 2000

Truth in Billing Rules

- Bill organization
 - Name of each provider for each charge
 - “Clear and conspicuous” notice of new charge
 - New provider -- one who did not bill in the previous month; describe whether IXC or LEC
- Descriptions of charges
 - “Plain language” description
- Deniable/nondeniable identification
- Clear, conspicuous disclosure of inquiry contact information

In key respects, rules require
clarification and/or
modification...

Deniable/nondeniable

- FCC has overreached its jurisdiction, but if the Commission seeks to affirm this requirement
 - must clarify that it is LEC's responsibility to implement
 - IXC's have no contractual or legal right to deny local service for nonpayment of toll

New service provider notice

- Rule provides that “billing entity” must provide clear and conspicuous notice of any change in service provider
- Dispute has emerged about which entity has responsibility for triggering this notice
 - In case of LEC-billed long distance, LEC should:
 - Review PIC information stored in its switches to determine current IXC;
 - State on bill the PIC'd carrier as of a date certain; and
 - Take steps necessary to determine if the carrier is “new.”

New service provider notice

- FCC must clarify that non-presubscribed traffic (e.g., dial around) is specifically excluded from the notice requirement
 - There is no ongoing relationship between a dial around provider and a dial around user; a “per call” purchase decision